

JP

STATE OF MARYLAND

v.

JULIAN VON BLACKMAN

IN THE CIRCUIT COURT

FOR FREDERICK COUNTY

CASE NO. C-10-CR-18-000914

UNOPPOSED MOTION TO MODIFY THE TERMS OF PROBATION

COMES NOW, Defendant Julian Von Blackman, by and through counsel, Stephanie L. Pankiewicz, and respectfully requests the Court modify the terms of his probation. In support thereof, Defendant provides the following:

1. On March 1, 2019, Defendant was before the Honorable Richard Sandy, after pleading guilty to possession of child pornography, and was granted a Probation Before Judgement and placed on supervised probation with additional restrictions under the COMET program.
2. As a condition of his probation Judge Sandy ordered Defendant not play any video games, and not engage in any social media programs. It was also ordered for him to not have contact with any minors.
3. Mr. Blackman is still a very young man, at nineteen (19) years old, where many social events and activities includes minors of the ages 16 and 17 and many individuals who are newly 18.
4. As of this date, Mr. Blackman is participating in probation, and is submitting and completing polygraphs to confirm his compliance.
5. After discussion with his supervising agent, Defendant Blackman is asking the Court to consider modifying his probation to allow him to have contact with individuals who are 16 and 17, as many of any scheduled activities with his classmates include individuals in this age bracket.

6. Defendant is also requesting the Court modify the term of his probation in regards to the video games.
7. His supervising agent is in agreement with these two modifications to the terms of his probation.
8. Counsel for Defendant has spoken with Assistant State's Attorney Joyce King who is unopposed to these two modifications to the term of his probation.

WHEREFORE, Defendant respectfully requests the Court modify the terms of his probation to permit him contact with individuals who are 16 and 17 years of age, and to permit him to play video games during the period of probation. Defendant requests a hearing on his modification, as well as any and all further relief the Court deems appropriate.

Respectfully submitted,

/s/Stephanie Pankiewicz
Stephanie Pankiewicz
Assistant Public Defender
CPF No. 1306190090

100 West Patrick Street
Frederick, MD 21701
(301) 600-1988

Fax: (301) 600-1986
E-Mail: SPankiewicz@opd.state.md.us

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 26, 2019, a copy of the foregoing was electronically filed through MDEC to the Court and to the State's Attorney's Office for Frederick County.

/s/Stephanie Pankiewicz
Stephanie Pankiewicz
Assistant Public Defender